IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

IN THE MATTER OF THE SEARCH OF the residence located at 905 RICHARDSON VISTA ROAD # 59, ANCHORAGE, ALASKA, set forth in Attachment A, for the items set forth in Attachment B.

Case No.: 3:23-mj-00031-KFR

Filed Under Seal

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Special Agent Robert Douglas, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I make and submit this Affidavit in support of an Application pursuant to Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the search of the residence located at 905 RICHARDSON VISTA ROAD # 59, ANCHORAGE, ALASKA set forth in Attachment A, further referred to as "Target Residence".
- 2. I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I have been a Special Agent with the FBI since May 2018. Since that time, I have been assigned investigative responsibilities in the areas of violent gangs and criminal enterprises investigation in the Anchorage Field Office where I am currently assigned. The Anchorage Field Office is located within the District of

Alaska. During this assignment, I have focused on drug, violent gang, criminal enterprises and felon in possession of a weapon investigations. I have become familiar with the methods commonly used by criminal enterprises and felons in possession of weapons in Alaska. I have been involved in cases involving the investigation and prosecution of defendants for violations of Title 18 of the United States Code. I have been assigned as the Bank Robbery Coordinator during my time with the Anchorage Field Office, and I have assisted with the investigation of numerous bank robberies between October 2018 and current.

- 3. Prior to my appointment with the FBI, I was employed with the Ontario Police Department (OPD) in Ontario, Oregon, as a Police Officer and Patrol Sergeant. As a Police Officer and Patrol Sergeant, I was assigned to and participated in traffic enforcement and investigations involving drug crimes, crimes against property, and crimes against persons, to include homicides. I also led and participated in a large number of drug-related arrests and surveillance operations. I also assisted in the preparation and execution of numerous search and arrest warrants.
- 4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
- 5. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 2113(a), 18 U.S.C. § 2113(b), and 18 U.S.C. §

2113(g) – Credit Union Robbery occurred on or about January 8, 2023. There is also probable cause to search the Target Residence described in Attachment A for evidence of these crimes, as further described in Attachment B.

INVESTIGATION AND PROBABLE CAUSE

- 1. Alaska USA Federal Credit Union (Alaska USA FCU) is a credit union that was, at all times relevant to this case, insured by the National Credit Union Administration Board. Alaska USA FCU operates a number of branches in Anchorage, Alaska to provide financial services to its members.
- 2. At approximately 2:03 pm on January 8, 2023, a male entered the Alaska USA FCU branch located at 7575 Debarr Road. He was wearing black or dark, ankle height boots, gray sweat pants, a black or dark Nike, hooded jacket with a zipper down the front, a gator over his neck/face displaying the stars and stripes in black and camo, black or dark winter gloves (possibly neoprene), and a black or dark gray beanie with a red tag on the front of it with white lettering (appears to be the emblem for Milwaukee Tools).
- 3. The male was estimated at around six feet tall based on credit union employee accounts. The male subject, a Caucasian, or someone of light skin complexion, had a tattoo on the front of his neck, which was visible under the face/neck covering. A still photo of the male subject is depicted below:





4. The male subject waited in line until being called forward to an open teller window by a credit union employee. Upon reaching the window, the male subject produced a hand written note, which appeared to be written in black sharpie. Witness accounts stated that the first line of the note had the phrase, "I have a gun". While waiting for credit union employees to hand over money, the male subject stated, "Hurry up" multiple times. Credit union employees handed over approximately \$1,760.00 in US Currency to the subject. This money included five \$100.00 bait bills with the following serial numbers: MB51677794P; ME75298436B; PG62121589B; MH35630761A; and MK72045629C. The male subject stuffed the money into his pockets, and hurried out of the credit union, taking the demand note with him. On the credit union video surveillance footage, the male subject could be seen getting into and leaving in a vehicle, later identified as a gray, 1991 Buick Century (VIN # 3G4AH54N7MS621004), further referred to as the Target Vehicle. Still photos of the male subject getting into the Target Vehicle are depicted below:





5. The map below depicts the location of the Alaska USA FCU branch and the surrounding businesses:



- 6. Anchorage Police Department (APD) Officers and Federal Bureau of Investigation (FBI) Special Agents and Federal Task Force Officers responded to the credit union to investigate. Law enforcement reviewed still photographs from the credit union surveillance video, which depicted the Target Vehicle.
- 7. After reviewing the photos from the video, APD Officers determined that the Target Vehicle was similar to a 1990's model Buick Century. Photos from the video showed that the Target Vehicle had unique body damage to the front, passenger side corner panel. APD Officers reviewed traffic light camera footage and were able to follow a possible match for the Target Vehicle via the traffic light cameras. Video showed that the possible match for the Target Vehicle traveled west on Debarr Road to Bragaw Street, then traveled north on Bragaw Street to Peterkin Avenue, where it turned westbound onto Peterkin Avenue (Mountain View area of Anchorage).
- 8. At approximately 7:00 pm, APD Officers located a gray, 1991 Buick Century (bearing Alaska plate "LFY405") parked and unoccupied behind 425 Price Street. APD Officers noted the color, make, model, and front right fender damage matched the suspect vehicle description. The Target Vehicle was identified as being registered to Tawnee Ghrames. APD Officers set up surveillance in the area of the Target Vehicle and applied for a state GPS tracking warrant, in order to place a GPS tracking device on the Target Vehicle.
- 9. At approximately 9:30 pm, while APD Officers were applying for the state warrant, the Target Vehicle was driven by an unknown individual to 905

Richardson Vista Road building # 3. The Target vehicle was monitored by APD Officers during this time, and APD Officers saw the Target vehicle park in garage # 26. APD Officers observed a heavyset, light-skinned male exit the garage and enter the building through a common access door. APD Officers contacted North Point Apartments and were informed that the garage was registered to Sara Skan, who resides in unit # 59. At the request of the FBI, APD Officers seized the Target Vehicle pending application of a federal search warrant. The Target Vehicle was transported to 4501 Elmore Road, where it is currently being held in APD secure storage.

- 10. On January 18, 2023, search warrant 3:23-mj-00024-KFR, issued in the United States District Court for the District of Alaska, was executed on a gray, 1991 Buick Century with VIN # 3G4AH54N7MS621004. During the execution of the search warrant, the following items were located inside the vehicle and photographed:
 - a. A Carrs/Safeway (1340 Gambell Street) receipt for a transaction on 01/03/23
 - b. A Speedway Express (341 Boniface Parkway) receipt for a transaction on 01/08/23 (same date as date of credit union robbery)
 - c. A MasterCard Aspiration Debit card with the name "Daniel Sanders"
- 11. Following the execution of the search warrant, Task Force Officer (TFO) Josh Vance submitted requests to Carrs/Safeway and Speedway Express for video surveillance footage surrounding the times noted on the receipts. TFO Vance

also searched law enforcement databases and located a Daniel Lee Sanders, date of birth (DOB) February 3, 1983. A photo of Sanders showed that Sanders had a neck tattoo, which was consistent with the tattoo observed on the credit union robbery suspect during review of the Alaska USA Federal Credit Union video surveillance.

12. A known photograph of Daniel Lee Sanders is depicted below:



13. Photographs of the credit union robbery suspect are depicted below:









- 14. On January 18, 2023, Special Agent (SA) Robert Douglas and Task
 Force Officer (TFO) Josh Vance interviewed the registered owner of the gray, 1991
 Buick Century, Tawnee Ghrames. Ghrames advised that she used to have a vehicle
 like the one in question. Ghrames had sold the vehicle for a couple hundred dollars
 to a female named Danielle Lynn. Lynn had been Ghrames' brother's ex. Lynn was
 simply a middle man, however, and Lynn then sold the vehicle to a male and female
 whom Ghrames did not know.
- 15. Ghrames' stated that her brother, Jeramie Ghrames (Jeramie), would know the name of the couple that ultimately bought the car because he had rented a garage from them for \$50.00. Ghrames' boyfriend, Justin Larson, also might know the name of the individuals who bought the car.
- 16. Ghrames called Larson to inquire about the individuals who bought the car. Larson could not recall their names, but advised that he would call Jeramie to ask the same question. Larson called Ghrames back a short time later.



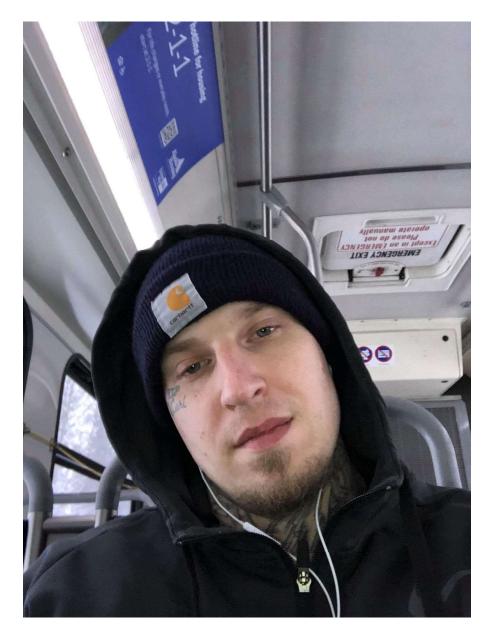
- 17. Ghrames was told by Larson that according to Jeramie, Daniel Sanders was the individual who ultimately bought the car from Lynn. Jeramie also told Larson that he still had the person (Sanders) who bought the car on Facebook. Ghrames stated that Jeramie lived with her and he would be available for an interview the next night.
- 18. On January 18, 2023, TFO Josh Vance conducted a Facebook search of "Daniel Sanders" resulted in two profiles for "DANIEL SANDERS (DUCK)" and "DANIEL L SANDERS (DUCK)". Both had profile pictures showing the Sanders that had been located in the law enforcement databases search. The profile picture for DANIEL SANDERS (DUCK) showed a profile picture of SANDERS with an unknown female. A screenshot of the profile picture is depicted below:



19. TFO Josh Vance observed that in other photographs Sanders is seen wearing a black full zip hoody with a subdued gray Nike logo. Facebook information indicates that these photos were uploaded two years ago. This hoody is consistent with what the robbery suspect had been seen wearing at the time of the credit union



robbery. Photos showing the black full zip hoody with a subdued gray Nike logo are depicted below:







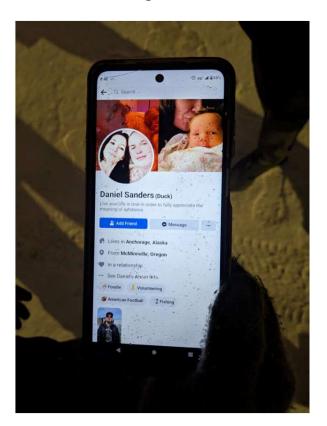
20. TFO Josh Vance spoke with APD Officer Rebecca Carson in reference to Daniel Sanders. Officer Carson advised Sanders was in a relationship with Sara Skan and they had recently had a child together. TFO Josh Vance reviewed a photograph of Skan dated 01/26/2021 which confirmed Skan was the unknown female in the Facebook profile picture of Sanders. A law enforcement database search revealed that Skan was on Adult Probation. TFO Josh Vance spoke with Adult Probations who confirmed Skan as an absconder, and her last provided address was 905 Richardson Vista #59, Anchorage, AK. This address was from 2020 when Skan had last checked in with Adult Probations. TFO Josh Vance conducted a search of APD records and discovered that Sanders most recent

physical address reported to APD was 130 Cordova St, Anchorage, AK, which TFO Josh Vance knows to be the Cordova Center Halfway House. Prior to this address Sanders reported to APD his physical address to be 905 Richardson Vista Rd #59, Anchorage, AK. This was reported to APD on 12/10/2020.

- 21. On January 19, 2023, SA Robert Douglas spoke with Matt Bremer of the United States Marshals Service (USMS) for the District of Alaska. Bremer advised that USMS was currently looking for Daniel Sanders, date of birth (DOB) February 3, 1983, in relation to a federal probation warrant for his arrest. USMS had been advised by federal probation that Sanders had last spoken with his Probation Officer (PO) the week of Christmas 2022. At that time, Sanders had advised his PO that he was still residing with his girlfriend, Sara Skan, at 905 Richardson Vista Road # 59, Anchorage, Alaska. In checking law enforcement databases, SA Douglas located a Sara Skan, DOB July 1, 1980, with an address of 905 Richardson Vista Road # 59, Anchorage, Alaska.
- 22. On January 19, 2023, SA Robert Douglas and TFO Josh Vance interviewed Jeramie Ghrames. Jeramie Ghrames stated that he had been dating and living with a female by the name of Danielle. Danielle helped set up an agreement with Jeramie Ghrames and a couple, Daniel and Sara, where Jeramie Ghrames could rent a garage from Daniel and Sara in order to work on cars. Jeramie Ghrames only met Daniel and Sara a couple of times. Jeramie Ghrames knew Daniel and Sara to be the individuals who ultimately purchased the vehicle

from his sister, Tawnee Ghrames. Jeramie Ghrames estimated the sale of the car took place over a year ago.

- 23. Jeramie Ghrames stated that Daniel had a lot of tattoos all over his body, but Jeramie Ghrames could not remember if Daniel had tattoos on his face, neck or area of throat. Jeramie Ghrames did have Daniel as a contact in Facebook.
- 24. Ghrames pulled up a Facebook account page of who he knew to be Daniel. Jeramie Ghrames knew this to be the Daniel that had purchased the car. The female in the picture with Daniel was the person Jeramie Ghrames knew to be Sara. A photo of the Facebook account is depicted below:



25. Jeramie Ghrames stated that the last time he had contact with Daniel and Sara, he knew them to reside at some large, white apartments near the



Government Hill gate for the military base. Instead of going straight into the base, one turn at the last available street before the base and then travel down a ways.

One would then take a left into the apartment complex. The road through the apartment complex was a one way loop.

26. TFO Vance is familiar with this apartment complex and knew it to be the North Point Apartments complex located at 905 Richardson Vista Road. An overhead view of the apartment complex is depicted below:



27. During the interview with Jeramie Ghrames, it was noted that Jeramie Ghrames was wearing a black or dark colored beanie with a red tag on the front with the word "Milwaukee" (emblem for Milwaukee tools). This beanie was consistent with that worn by the credit union robbery suspect on the date of the robbery. TFO Josh Vance was able to photograph Jeramie Ghrames wearing the beanie, which is depicted below:



AUTHORIZATION REQUEST

- 28. Based on the facts set forth in this affidavit, there is probable cause to believe that violation of 18 U.S.C. § 2113(a), 18 U.S.C. § 2113(b), and 18 U.S.C. § 2113(g) Credit Union Robbery occurred, and that evidence of these crimes, as set forth in Attachment B, will be found in the Target Residence.
- 29. I respectfully request that the Court issue a warrant authorizing the FBI and its authorized representatives, including but not limited to other law enforcement agents assisting in the above-described investigation, to search the

Target Residence in the District of Alaska within 14 calendar days of the issuance of the requested warrant.

30. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation, including by giving targets an opportunity to destroy or tamper with evidence, change patterns of behavior, notify confederates, and flee from prosecution.

Respectfully submitted,

Robert Douglas

Special Agent

Federal Bureau of Investigation

Telephonically sworn and affirmed.

Subscribed and sworn to before me on

Kyle F. Reardon, United States Magistrate Judge

UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to Be Searched

Apartment located at 905 Richardson Vista Road # 59, Anchorage, Alaska. Located within building # 3 of the North Pointe Apartments complex situated on Richardson Vista Road. Building # 3 is a cream colored, multi-level apartment building with multiple common entrances, one of which is labeled as the entrance for units 55-60, which has a turquoise colored door for entrance.









ATTACHMENT B

Particular Things to be Seized

All evidentiary items found in or on the Target Residence described in **Attachment**A that constitute fruits, evidence, and instrumentalities of violations of: 18 U.S.C. §

2113(a), 18 U.S.C. § 2113(b), and 18 U.S.C. § 2113(g) – Credit Union Robbery

The fruits, evidence, and instrumentalities of the above violations may include:

- US Currency consisting of \$100.00, \$50.00, and \$20.00 bills to include five \$100.00 bills with the following serial numbers: MB51677794P; ME75298436B;
 PG62121589B; MH35630761A; and MK72045629C; totally up to \$1,760.00;
- 2. White paper with black handwriting on it consistent with that written with a sharpie which includes the phrase "I have a gun";
- 3. Black or dark ankle height boots;
- 4. Gray sweatpants;
- 5. Black or dark, Nike hooded jacket with a zipper down the front with a subdued gray or dark Nike logo;
- 6. A gator over his neck/face displaying the stars and stripes in black and camo;
- 7. Black or dark gray beanie with a red tag on the front of it with white lettering, to include a red tag with the emblem for Milwaukee Tools;
- 8. Black or dark winter gloves to include neoprene style gloves;
- 9. Firearms, ammunition, holsters, firearm accessories, and any other firearms related evidence showing possession and/or ownership of firearms;

- 10. Evidence showing dominion, control and residence at 905 Richardson Vista Road building # 3, unit # 59, Anchorage, Alaska;
- 11. Evidence of who used, owned, or controlled the Target Vehicle, a gray 1991 Buick

 Century with VIN # 3G4AH54N7MS621004, at the time of the credit union robbery;

 and
- 12. Documents sufficient to show dominion and control of the Target Residence to be searched;